

**IN THE UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

KENNETH PRITCHARD,

Plaintiff,

v.

METROPOLITAN WASHINGTON  
AIRPORTS AUTHORITY

Defendant.

Civil Action No. 1:18-cv-1432-AJT-TCB

**AFFIDAVIT OF NANCY ROBINSON**

My name is Nancy Robinson and I reside in Fairfax VA. I am over eighteen (18) years of age and am competent to testify. I make the following declaration based on my personal knowledge of the following facts:

1. I am employed as a Senior Specialist, Organizational Design and Management for the Metropolitan Washington Airports Authority ("Airports Authority").
2. I am a white (Caucasian) female.
3. I began employment with the Airports Authority in October 2014 working in the Airports Authority's Compensation Department, which was managed by Kenneth Pritchard. I worked in close physical proximity to Mr. Pritchard.
4. Mr. Pritchard would often criticize the Airports Authority and senior management in our staff meetings, most particularly his supervisor the Vice President of Human Resources Anthony Vegliante, who is my second level supervisor. I recall one staff meeting where Mr. Pritchard would say the name of another person in the Office of Human Resources and then he went around the table and we were required to say whether we "trusted" that person or not. This went on through several rounds of names. I was so disgusted by this "exercise" that I almost got up and walked out, but



I worried I would be fired if I did.

5. Mr. Pritchard would routinely speak in a loud voice and use profane language at work. I could hear Mr. Pritchard cursing and yelling in his office throughout the workday. Since I sat directly outside his office, I would often get up and close his office door so that I would not have to listen to him yelling. From time to time, I would tell Mr. Pritchard that I thought his behavior was inappropriate, and for a short period of time thereafter his behavior would improve. This never would last though.
6. I often heard Mr. Pritchard refer sarcastically to senior management, particularly V.P. Anthony Vegliante and CEO John Potter as the "brain trust," and heard him say that he "hates these people."
7. I found Mr. Pritchard's behavior to be disruptive to the workplace because of his raised voice, loud complaining and use of foul language.
8. There were several times I found Mr. Pritchard's comments to be completely inappropriate in a different way. When I would go to him with an issue or problem I was having with one of my (female) co-workers, he would say it was because we were women and "that's what happens when there are three women and one male manager." On at least two occasions I can recall, he made the comment that he was "the guy in the Cadillac with the fur coat and rings on all his fingers" and we were his "women". Without him actually saying the word, I believe he was referring to himself as the "pimp" and we were the women working for him. It was an extremely creepy and inappropriate thing to say.
9. Mr. Pritchard would say that V.P. Anthony Vegliante and CEO John Potter were "idiots" and "incompetents."

10. I was specifically told by Mr. Pritchard not to talk to V.P. Vegliante or answer his questions, and was told that our group would not meet work deadlines requested by others because Mr. Pritchard would not shift priorities from something he wanted us to work on instead. There were some projects—or aspects of projects (such as the new HR system, Workday) about which Mr. Pritchard said he would fire us if we assisted with their implementation.
11. Mr. Pritchard assigned me what I believe to be “personal” work of his and not work for the Airports Authority. This included assigning me a project with regard to the “Employer Support of the Guard and Reserve (ESGR) Pledge Initiative” which had not been approved by the Airports Authority. At one point, Mr. Pritchard asked me to obtain the home addresses of several Board members so he could contact them directly about this project. This made me uncomfortable. In October 2016, despite being told by Mr. Vegliante that MWAA would not pursue this ESGR Pledge Initiative, Mr. Pritchard wrote directly to the two Airport Managers (DCA and IAD), who were vice presidents and the Vice President for Public Safety. In his letter to them, Mr. Pritchard wrote that he had “gone forward within the Airports Authority on this matter”, but that he was now going directly to DCA, IAD, and the Office of Public Safety to urge them to support the project. At the time, I was very surprised that he would go around his manager (VP Vegliante) and go directly to the other vice presidents.
12. Another example of a personal project was a research project on the perceived impact of various amounts of pay raises on employee satisfaction with that pay raise, which was conducted by an outside consultant, HumRRO. At the conclusion of the project,

I asked Mr. Pritchard if he was going to brief VP Vegliante, and he said he had not told him about the project nor would VP Vegliante “care” about the results. Mr. Pritchard (and HumRRO) published the preliminary results of this study in an academic journal; in addition, the results were presented by HumRRO at a professional conference. Mr. Pritchard had me work with HumRRO to submit the research to several other organizations and journals. A number of times Mr. Pritchard announced that this “would get his name in print again.”

13. Mr. Pritchard’s behavior created a stressful and hostile work environment for me.

Prior to going on a two-week vacation in early October of 2016, I told Mr. Pritchard that I was looking forward to being away because I could not take the yelling and arguing any more. He asked if I thought it had gotten worse, and I said yes: that over the two years I had been working for him, I thought it was getting worse and worse. After I returned from a vacation and found that Mr. Pritchard’s behavior had not improved, I began to look for other employment as a means to escape the environment created by Mr. Pritchard.

14. I have reviewed paragraph 38(d)(iii) of the Amended Complaint filed by Mr.

Pritchard in this matter. Mr. Pritchard told me that other Airports Authority employees were awarded recognition for their work in connection with the creation of a new system to regulate transportation network companies (TNCs), such as Uber and Lyft. Mr. Pritchard was upset that he and I were not recognized for our roles in this project. My role in this project was to research the requirements for regulating TNCs and how that would impact our Traffic Control Officers. I revised that job description with the new duties which was among my core duties. If Mr. Pritchard

had wanted to recognize my contribution to this project he could have done so, as it was within his discretion to award me an "IMAD" ("I Made a Difference") award.

I solemnly declare and affirm, under penalty of perjury under the laws of the United States, that the contents of the foregoing paper are true and correct to the best of my knowledge, information and belief.

Date: 9-6-19

Nancy Robinson  
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